

February 6, 2006

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Telwise Corporation, EB Docket No. 06-36 & EB-06-TC-060

Dear Ms. Dortch:

On behalf of Telwise Corporation (“Telwise”), and pursuant to the Commission’s Public Notice dated February 2, 2006,^{1/} we are submitting Telwise’s Certification of CPNI Filing along with a statement explaining how Telwise’s operating procedures ensure compliance with the Commission’s CPNI rules.

In accordance with Section 1.12 of the Commission’s Rules, please direct any questions or correspondence to the undersigned.

Sincerely,

/s/

Christopher R. Bjornson

Attachments

WDC 381917v.1

^{1/} Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications, DA 06-258, Public Notice (rel. February 2, 2006).

**TelWise Corporation
73 Radford Street
Yonkers, New York 10705**

February 2, 2006

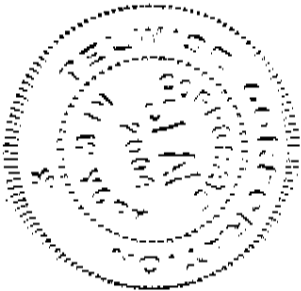
I certify that I have personal knowledge that Telwise Corporation ("Telwise") has established operating procedures that are adequate to ensure compliance with the FCC's Part 64, Subpart U Rules, 47 C.F.R. 64.2001 to 64.2009, which implement Section 222 of the Communications Act of 1934, as amended, 47 U.S.C. Section 222, regarding Customer Proprietary Network Information. A statement describing Telwise's efforts to remain compliant is attached to this document.

President

Christopher S. Mallari
Christopher S. Mallari

Vice-President

Jaime Mallari
Jaime Mallari



Statement Accompanying Annual Compliance Certificate

Pursuant to Section 64.2009 of the Federal Communications Commission's ("Commission's") rules and regulations, 47 C.F.R. § 64.2009, Telwise Corporation ("Telwise") has prepared this statement outlining why its operating procedures ensure that it is in compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules. Telwise has developed a CPNI compliance program to ensure that the use, disclosure, or access to CPNI by Telwise employees, joint venture partners, or third parties is in accordance with the FCC's rules. Under its compliance program, Telwise maintains the following:

- **Employee Training:** Telwise conducts training to ensure that employees with access to CPNI records comply with the FCC's rules and regulations.
- **An Employee Discipline Program:** Telwise has implemented an employee discipline process to handle situations involving the impermissible use of a customer's CPNI. Telwise disciplines employees that fail to comply with the FCC's CPNI rules.
- **A Supervisory Review Process for All Sales and Marketing Campaigns:** Telwise supervisors review sales and marketing campaigns to ensure that they comply with the FCC's CPNI rules. Telwise retains records of such reviews for one calendar year.
- **A System to Retain Records of Telwise and its Affiliates' Sales and Marketing Campaigns:** Sales and marketing campaigns that use CPNI are maintained by Telwise. Records of such campaigns are kept for one calendar year.
- **A Process to Maintain Customer Approvals:** Telwise has developed a system to allow its employees, affiliates, agents, joint venture partners, or independent contractors to determine the status of a customer's approval to use its CPNI, whenever customer approval is required. Under the FCC's rules, Telwise is not required to obtain customer consent to use CPNI in all circumstances. To the extent required, Telwise obtains customer approvals and retains records of such approvals for one calendar year.
- **Confidentiality Procedures:** Telwise takes steps to ensure that CPNI received by its agents, affiliates, joint venture partners, and independent contractors is used properly. Telwise requires that the CPNI only be used for the purpose it was provided for and not disclosed to any other party, unless required by force of law.
- **A Method to Ensure that Telwise Sends Opt-out Notifications:** To the extent required, Telwise sends customers opt-out notifications every two years. Telwise waits thirty days before it infers that customer has consented to the use of its CPNI.
- **A Mechanism to For Customer CPNI Restriction:** Telwise maintains a system to allow customers to restrict the use of their CPNI to the extent use of their CPNI may be restricted pursuant to the FCC's rules.
- **Procedures to Communicate Opt-Out Failures to the FCC:** Telwise has procedures in place to determine when its opt-out procedures are not working effectively. Telwise will notify the FCC by letter within five business days if its opt-out mechanism does not work properly.